# Exhibit 22

### **TaylorWessing**

The Financial Times Bracken House 1 Friday St London EC4M 9BT Taylor Wessing LLP 5 New Street Square London EC4A 3TW

Tel +44 (0)20 7300 7000 Fax +44 (0)20 7300 7100 DX 41 London www.taylorwessing.com

PRIVATE & CONFIDENTIAL
NOT FOR PUBLICATION
FOR THE ATTENTION OF THE LEGAL DEPARTMENT ONLY

#### LETTER & ENCLOSURES BY COURIER:

tim.braton@ft.com and nigel.hanson@ft.com cc: roula.khalaf@ft.com and tom.burgis@ft.com

Date

1 September 2020

Our reference EUR138.U4 Your reference

Dear Sirs

Our client: Eurasian Natural Resources Corporation Limited ("ENRC")

We refer to your letter of 28 August. We adopt the same definitions as set out in our last letter.

Our client's position in relation to your involvement with the Book is fully reserved, especially as (a) you intend to publish an article by Mr Burgis ahead of its publication in order to publicise it and (b) he is employed and paid by you. Please confirm the extent to which the Financial Times has received information from the sources Neil Gerrard of Dechert LLP, Dechert LLP, Milltown Partners, Mark Hollingsworth, Ake-Jean Qajygeldin and/or individuals at the SFO acting improperly by return.

Given you doubt the assessment set out in our letter of 27 August that Mr Burgis has unlawfully obtained confidential information from various sources, which has then been distorted (either by his sources or by him) in order to try and support the publication of false and highly defamatory allegations against our client and, in relation to your proposed article, the false allegation that our client was involved in corrupt and organised criminal activities in Africa which resulted in suspicious deaths, we now enclose the following documents for your urgent attention:

- (1) The Particulars of Claim in the case of *Eurasian Natural Resources Corporation Limited v Mark Hollingsworth*
- (2) The Particulars of Claim in the case of Eurasian Natural Resources Corporation Limited v Ake-Jean Qajygeldin
- (3) Documents sent to the law firm Hogan Lovells from a whistle-blower evidencing that Mr Hollingsworth (suspected to be one of Mr Burgis's key sources) was involved in unlawful activities instead of journalistic activities. For example, some of these emails demonstrate that Mr Hollingsworth had an insider source at the SFO who was briefing him off-the-record about their investigation into ENRC. You will note that the SFO recently referred one of its

Taylor Wessing LLP is a limited liability partnership registered in England and Wales, registered number OC322935. A list of members is available for inspection at our registered office: 5 New Street Square, London EC4A 3TW.

Any reference to a partner in relation to Taylor Wessing LLP is to a member of Taylor Wessing LLP or an employee or consultant of Taylor Wessing LLP with equivalent standing as the members of Taylor Wessing LLP. Taylor Wessing LLP is authorised and regulated by the Solicitors Regulation Authority.

Taylor Wessing is the trading name used by a number of distinct legal entities. Further information can be found on our regulatory page at www.taylorwessing.com

## TaylorWessing

employees to the Metropolitan Police for investigation in relation to alleged leaks to the press, as reported here by Reuters<sup>1</sup>).

These documents detail how confidential information was unlawfully obtained, misused, distorted and disseminated by those whom our client suspects have provided information to Mr Burgis for publication in the Book. They describe much of the information which our client suspects he has been provided with in breach of confidence. They also demonstrate the methodologies used by Mr Hollingsworth when intentionally selecting and then distorting information for dissemination in order to damage our client.

Your review of these documents as part of your pre-publication verification exercise cannot lead you to any conclusion other than the one we have made you aware of, i.e. that Mr Burgis, having received information from a number of sources against which our client is currently litigating, is intent on using it to publish distorted, false and defamatory allegations to assist the black PR campaign being run by Milltown Partners and other various malicious third parties behind the scenes. Mr Burgis is now firmly part of that campaign and is working with those involved, and the Financial Times is due to become the next publishing vehicle to that end, along with Harper Collins. You will not be able to justify any reasonable belief that publishing the Allegation is in the public interest and all the points raised in our last letter in that regard are repeated here. Nor have you provided any evidence in support of the Allegation.

#### **Next steps**

We reiterate that if you have any documentation in your possession supporting the Allegation, please provide it for consideration together with a reasonable period of time (not less than 48 hours) to respond. Likewise, if you have other allegations to put to our client, please provide them and any supporting evidence allowing our client no less than 48 hours to consider and respond. Otherwise, please confirm by no later than 5pm today that you no longer intend to publish the Allegation or any allegation with a similar meaning.

In the meantime, all of our client's rights and remedies are and shall remain expressly reserved.

Yours faithfully

Taylor Wessing LLP

https://uk.reuters.com/article/uk-britain-enrc-sfo/uks-fraud-office-refers-employee-to-police-amid-leak-allegations-idUKKBN20E2ND